

American Pistachio Growers
California Citrus Mutual
California Cotton Growers Association
California Cotton Ginners Association
California Grain and Feed Association
California Grape and Tree Fruit League
California Pear Growers Association
California Rice Commission
California Seed Association
California Tomato Growers Association
Pacific Egg and Poultry Association
Nisei Farmers League
Western Agricultural Processors Association
Western Growers Association

January 9, 2012

Manucher Alemi, Ph. D., P.E.

Chief, Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
Department of Water Resources
901 P Street
Sacramento, CA 95814

Submitted via email: jemaa@water.ca.gov

Re: Draft Report to the Legislature on the Methodology for Quantifying the Efficiency of Agricultural Water Use and Its Implementation Plan

Dear Dr. Alemi:

Thank you for the opportunity to provide public comment on the above mentioned Draft report to the Legislature dated December 21, 2011. Although this draft has significantly improved, we have the following comments:

- **Productivity and Value** – We are still greatly concerned that this section of the draft will be misunderstood and/or misused. Although the current Draft attempts to clarify the distinction between Methodology and Productivity Indicators, we are concerned with the language regarding the productivity indicators applicability to the field scale. As you state in the document, “many factors such as climate, soil conditions, water quality, crop type, crop management, market conditions affect the productivity and value of agricultural crops”. Discussing the indicator of economic productivity at the field level could leave the reader guessing on how

the information could or should be used. Because DWR believes this section should remain in the report, we would ask that you limit it to the broader county and statewide scale.

Pages 40-43 are examples of water use efficiency and should be placed in Section 2 “Water Use and Use Efficiency in Agriculture” or 3 “Quantifying the efficiency of Agricultural Water Use”. Based on the discussion at our January 4th meeting, it is our understanding that you agree these pages do not belong in Section 4 “Supplemental Indicators for Crop Productivity”.

- Implementation – Section 5.2 describes the supplier and field scale methods only. However, Section 5 discusses the regional, supplier and field scales. For clarity and readability, this section should begin by including a paragraph on the regional scale followed by the supplier and field scales.

The use of “completion dates” in this report is premature and assumes the Legislature will act quickly. This kind of information can be negotiated if/when the Legislature decides it wants DWR to implement all or some of the plan. It makes sense to follow the Water Plan update schedule; however, we believe including completion dates in an informational report to the Legislature will create unintended negative consequences on the agricultural community.

- Costs – We remain concerned that the costs reflected in this draft are significantly understated. Based on the discussion at our January 4th meeting, it is our understanding this section will be reworked and reflect a more realistic accurate accounting of costs associated with implementing each of the three scales.

We appreciate the Department’s willingness to extend the deadlines for commenting on the drafts, and we look forward to reviewing the next draft on February 3rd. Again, thank you for the opportunity to comment and participate in this process.